

**IN THE UNITED STATES COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
CIVIL ACTION – LAW**

SIMONA OCKLEY	)	
	)	
vs.	)	<b>CIV. NO.: 2:24-cv-04070</b>
	)	
TOWNSHIP OF RADNOR, PENNSYLVANIA	)	
	)	
Defendants.	)	
	)	

**PLAINTIFF’S RESPONSE TO DEFENDANTS, RADNOR TOWNSHIP,  
JENNIFER COCCO, JOSEPH PINTO, BRADY MCHALE AND BRIAN BROWN’S,  
AFFIRMATIVE DEFENSES**

Plaintiff, Simona Ockley, by and through her undersigned counsel submit the following responses to Defendants’ Affirmative Defenses and aver as follows:

1 – 5. Denied as conclusions of law.

6. Denied as conclusions of law. By way of further answer, Answering Defendants have failed to come forth with any facts supporting their claim that Plaintiff’s injuries and damages were caused by other persons or entities.

7. Denied as conclusions of law. By way of further answer, Answering Defendants have failed to come forth with any facts supporting their claim that Plaintiff’s injuries and damages were caused by her own conduct.

8. Denied as a conclusion of law. By way of further answer, Plaintiff has retained copies of all relevant documents pertaining to her arrest and prosecution. By way of additional response, upon information and belief, all documents related to Plaintiff’s detention by Defendants for psychiatric examination and records of such examination have not been purged from the records of their original sources and are still extant.

9 – 11. Denied as conclusions of law.

WHEREFORE, Plaintiff demands judgment against defendants, Radnor Township, Jennifer Cocco, Joseph Pinto, Brady McHale and Brian Brown, jointly and severally, for actual damages, court costs, and attorney's fees and such other relief deemed to be just and equitable.

LAW OFFICE OF NEIL E. BOTEL

A handwritten signature in dark ink, appearing to read "Neil Botel", written in a cursive style.

BY:

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